

1 KEITH C. OWENS (CA Bar No. 184841) (*Admitted Pro Hac Vice*)
2 kowens@venable.com

3 JENNIFER L. NASSIRI (CA Bar No. 209796) (*Admitted Pro Hac Vice*)
4 jnassiri@venable.com

5 **VENABLE LLP**

6 2049 Century Park East, Suite 2100

7 Los Angeles, CA 90067

8 Telephone: (310) 229-9900

9 Facsimile: (310) 229-9901

Filed Electronically on 1/9/2015

10 -and-

11 LOUIS M. BUBALA III (NV Bar No. 8974)

12 lbubala@kcnvlaw.com

13 **KAEMPFER CROWELL**

14 50 W. Liberty Street, Suite 900

15 Reno, NV 89501

16 Telephone: (775) 852-3900

17 Facsimile: (775) 327-2011

18 Attorneys for U.S. Bank National Association, as Trustee, as successor-
19 in-interest to Bank of America, N.A., as Trustee, as successor by
20 merger to LaSalle Bank National Association, as Trustee, for the
21 registered holders of Greenwich Capital Commercial Funding Corp.,
22 Commercial Mortgage Trust 2005-GG3, Commercial Mortgage Pass
23 Through Certificates, Series 2005-GG3, by and through, CWC Capital
24 Asset Management LLC, solely in its capacity as Special Servicer

25 **UNITED STATES BANKRUPTCY COURT**
26 **DISTRICT OF NEVADA**

27 In re:

28 THE VILLAGE AT LAKERIDGE,
LLC aka MAGNOLIA VILLAGE,
LLC,

Debtor.

Case No. 11-51994-BTB
Chapter 11

**STIPULATION FURTHER CONTINUING
HEARINGS ON:**

- (1) **U.S. BANK'S MOTION FOR RELIEF FROM
THE AUTOMATIC STAY TO FORECLOSE
ON DEBTOR'S PROPERTY; AND**
(2) **MOTION FOR AUTHORITY TO USE CASH
COLLATERAL**

Current Hearing Date

Date: January 28, 2015

New Hearing Date

Date: May 5, 2015

Time: 2:00 p.m.

Place: Courtroom 2

1 This Stipulation is entered into by and between The Village at Lakeridge, LLC (the
2 “Debtor”), and U.S. Bank National Association, as Trustee, as successor-in-interest to Bank of
3 America N.A., as successor by merger to LaSalle Bank National Association, as Trustee (the
4 “Trustee”), for the registered holders of Greenwich Capital Commercial Funding Corp.,
5 Commercial Mortgage Trust 2005-GG3, Commercial Mortgage Pass Through Certificates, Series
6 2005-GG3 (the “Trust”), by and through CWC Capital Asset Management LLC, solely in its
7 capacity as Special Servicer (“CWCAM”) (collectively referred to herein as “U.S. Bank”), by and
8 through their respective counsel of record, hereby stipulate and agree as follows:

9 1. Subject to Court approval, the hearings on the Debtor’s Motion to Use Cash
10 Collateral (the “Cash Collateral Motion”) filed on July 18, 2011 [Docket No. 17], and U.S.
11 Bank’s Motion for Relief from Stay (the “Relief from Stay Motion”) filed on August 11, 2011
12 [Docket No. 26] (collectively, the “Motions”), currently set for hearing January 28, 2015 at 2:00
13 p.m., shall be continued to **May 5, 2015 at 2:00 p.m.**, or such other date as is convenient for the
14 Court (the “Continued Hearing Date”).

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

2. Nothing contained herein shall preclude either party from (a) filing a motion to advance the hearing on the Motions to a date earlier than the Continued Hearing Date in the event that the Ninth Circuit issues its ruling prior to the Continued Hearing Date, or (b) requesting that the Court further continue the hearings on the Motions in the event that the Ninth Circuit has not issued its ruling prior to the Continued Hearing Date.

Dated: January 9, 2015

VENABLE LLP

By: /s/ Keith C. Owens

Keith C. Owens

Attorneys for U.S. Bank National Association, as Trustee, as successor-in-interest to Bank of America, N.A., as Trustee, as successor by merger to LaSalle Bank National Association, as Trustee, for the registered holders of Greenwich Capital Commercial Funding Corp., Commercial Mortgage Trust 2005-GG3, Commercial Mortgage Pass Through Certificates, Series 2005-GG3, by and through, CWC Capital Asset Management LLC, solely in its capacity as Special Servicer

Dated: January 9, 2015

LAW OFFICES OF ALAN R. SMITH

By: /s/ Holly E. Estes

Holly E. Estes

Attorneys for Debtor

CERTIFICATE OF SERVICE

On January 9, 2015, I served the following document(s):

STIPULATION FURTHER CONTINUING HEARINGS ON:

- (1) U.S. BANK'S MOTION FOR RELIEF FROM THE AUTOMATIC STAY TO FORECLOSE ON DEBTOR'S PROPERTY; AND**
(2) MOTION FOR AUTHORITY TO USE CASH COLLATERAL

I served the above-named document(s) by the following means to the persons as listed below:

☒ a. **ECF System** (attach the "Notice of Electronic Filing" or list all persons and addresses):

- LOUIS M. BUBALA lbubala@kcnvlaw.com, bubalalawyer@gmail.com;wapplegate@kcnvlaw.com;cbyrne@kcnvlaw.com
- JANET L. CHUBB lbubala@kcnvlaw.com, wapplegate@kcnvlaw.com;cbyrne@kcnvlaw.com
- GREGORY A. CROSS gacross@venable.com
- JENNIFER L. NASSIRI jnassiri@venable.com
- KEITH C. OWENS kowens@venable.com
- HAMID R. RAFATJOO hrafatjoo@venable.com, jnassiri@venable.com;kfox2@venable.com;bclark@venable.com
- ALAN R SMITH mail@asmithlaw.com
- U.S. TRUSTEE - RN - 11 USTPRegion17.RE.ECF@usdoj.gov

☐ b. **United States mail, postage fully prepaid** (list persons and addresses):

☐ c. **Personal Service** (list persons and addresses)

I personally delivered the document(s) to the persons at these addresses:

☐ d. **By direct email (as opposed to through the ECF System)** (list persons and email addresses):

☐ e. **By fax transmission** (list persons and fax numbers):

☐ f. **By messenger:**

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 9th day of January, 2015.

Bambi Clark

Name

/s/ Bambi Clark

Signature